

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Pay Telephone)	CC Docket No. 96-128
Reclassification and Compensation)	
Provisions of the Telecommunications)	
Act of 1996)	

SUPPLEMENT TO PETITION FOR WAIVER

Charles L. Best
Associate General Counsel
Electric Lightwave, LLC
FRN 0008359440
4400 NE 77th Ave
Vancouver, WA 98662
Telephone: (360) 816-3311
Facsimile: (360) 816-0999
E-mail: cbest@eli.net

November 21, 2005

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Pay Telephone)	CC Docket No. 96-128
Reclassification and Compensation)	
Provisions of the Telecommunications)	
Act of 1996)	

SUPPLEMENT TO PETITION FOR WAIVER

Electric Lightwave, LLC (ELI) respectfully submits this Supplement to its Petition for Waiver of the Annual Audit requirements of 47 CFR Section 64.1320 for the 2005 audit year to further explain the circumstances for ELI's late filing and Request for Waiver.

In 2004, ELI hired KPMG to conduct the required audit of its dial-around payphone compensation methodology and its procedures for conveyance of settlement data to its vendor, Billing Concepts. The calendar year 2004 audit conducted by KPMG was not completed until March of 2005 because of complications in engaging KPMG and scheduling the audit. However, when the audit was completed, ELI's process for ascertaining the correct dial-around compensation was approved by KPMG (as documented in Exhibit "B" in our previous filing).

Further, it should be noted that Billing Concepts was separately audited and its processes approved by an independent accounting firm as detailed in the Exhibit "A" provided in our previous filing.

Given that KPMG's 2004 audit of ELI's dial-around compensation process was not completed until the first quarter of 2005 and that the related payment methodology of Billing Concepts has been annually audited, ELI believes it is appropriate to utilize the audit report for both 2004 and 2005. Since Billing Concepts payment methodologies have been audited annually and ELI's audit approved processes have not changed for 2005, a new report on ELI's processes just three months later would have reached the same conclusions. Consequently, ELI filed its original Petition for Waiver hoping to avoid paying the over \$92,000 KPMG audit fee twice for what would be essentially the same audit and report.

Since ELI has complied with the intent, if not the technical timing of the Commission's audit rules, granting ELI's Petition for Waiver will not undermine those rules. First, ELI's process for capturing dial-around compensation messages has been audited and approved. Second, ELI's settlement contractor, Billing Concepts, has been audited annually and found to be properly handling the messages for which dial-around compensation is due. Finally, and most importantly, Billing Concepts has been correctly remitting compensation to the payphone vendors of ELI throughout 2004 and 2005. Consequently, granting ELI's Petition will cause no harm.

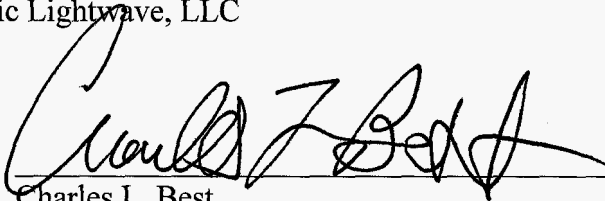
CONCLUSION

For the foregoing reasons, ELI has met its burden of showing good cause to qualify for a waiver of the annual verification requirements set out in 47 CFR Section 64.1320(f) for the year 2005. ELI respectfully requests the Commission issue an Order granting the requested waiver.

Respectfully submitted this 21st day November 2005.

Electric Lightwave, LLC

By:

A handwritten signature in black ink, appearing to read "Charles L. Best", is written over a horizontal line.

Charles L. Best
Associate General Counsel
4400 NE 77th Ave
Vancouver, WA 98662
(360) 816-3311